

### **REMARKS**

Reconsideration of the application, as amended, is respectfully requested.

Claims 1-8 were rejected under 35 U.S.C. 103(a) as being unpatentable over Chapman (US Patent No. 6,093,690). Claim 1 has been amended to recite the ratios of conjugate surfactant acid and polyamine employed in the synthesis of the polyanionic ammonium surfactant, as described at page 6 and in the Examples of the specification. Claim 1 has been further amended to make clear that the binder is liquid (page 28, line 10 of the specification).

In applicants' composition, the acid is fully neutralized by amine (total amine groups 2 to 10, it takes 2 equivalents of acid to neutralize 1 mole of amine, so 10 to 50% mole equivalent of amine per 100% acid). By contrast, in Example V of Chapman very small amount of polyethyleneimine is employed compared to the alkybenzene sulfonic acid. A vast excess of alkybenzene sulfonic acid is included. This results in a large amount of unneutralized alkybenzene sulfonic acid in the composition, which of course is then neutralized by sodium tripolyphosphate, so it results in the vast amount of sodium LAS, and a very small amount of neutralized polyethyleneimine. NaLAS is solid, so Example V of Chapman is solid granules, not a liquid binder.

Furthermore, in Example V there is no mention of incorporation of solid acid or specific alkaline ingredients recited in applicants' claim 5. The Examiner alleges that it would have been obvious to incorporate these ingredients from some mentions in other parts of Chapman's teaching. Even if it were so, the proportions incorporated would not have resulted in the independent solid acid and solid base since some or most of the base would have been taken up by vast quantity of alkybenzene sulfonic acid remaining after the neutralization of polyethyleneimine to produce NaLAS.

It is not seen how one of ordinary skill in the art, who has not had the benefit of hindsight afforded by the present disclosure, would have been led by Chapman modify Example V in such a way as to neutralize 100% of the alkybenzene sulfonic acid with polyamine in order to attain applicants' liquid binder, rather than employing a vast excess of alkybenzene sulfonic acid taught by Chapman, and then incorporating the solid acid and the solid base that would have been unused for the neutralization of alkybenzene sulfonic acid. In light of the above amendments and remarks, it is respectfully requested that the obviousness rejection over Chapman be reconsidered and withdrawn.

In light of the above amendments and remarks, it is respectfully requested that the application be allowed to issue.

Applicants respectfully request the Examiner's consideration of a Supplemental Information Disclosure Statement submitted concurrently herewith.

If a telephone conversation would be of assistance in advancing the prosecution of the present application, applicants' undersigned attorney invites the Examiner to telephone at the number provided.

Respectfully submitted,



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